

FILED

MAY 27 2025

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

AT 8:30 ^M
CLERK, U.S. DISTRICT COURT - DNJ

UNITED STATES OF AMERICA : Hon. J. Brendan Day
:
v. : 25-mj-5034 (JBD)
:
GADIEL MOLINA-ANDRADE : **CRIMINAL COMPLAINT**

I, Ellen Chao, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Deportation Officer with the United States Department of Homeland Security, Immigration and Customs Enforcement, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

/s/ Ellen Chao
Ellen Chao
Deportation Officer
United States Department of
Homeland Security, Immigration
and Customs Enforcement

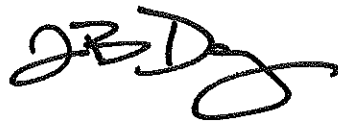
Attested to me by telephone, pursuant to FRCP 4.1(b)(2)(A),

5/27/2025

Date

Honorable J. Brendan Day
United States Magistrate Judge
Name & Title of Judicial Officer

District of New Jersey


Signature of Judicial Officer

ATTACHMENT A

(Illegal Reentry to the United States)

On or after December 20, 2013, and on or before May 4, 2025, in Ocean County, in the District of New Jersey, and elsewhere, the defendant,

GADIEL MOLINA-ANDRADE,

an alien who had been deported and removed and had departed the United States while an order of deportation and removal was outstanding, without the express consent of the Secretary of Homeland Security or the Attorney General of the United States to reapply for admission prior to his reembarkation at a place outside the United States, did knowingly and voluntarily enter and, on or about May 4, 2025, was found in the United States.

In violation of Title 8, United States Code, Section 1326(a).

ATTACHMENT B

I, Ellen Chao, am a Deportation Officer with the United States Department of Homeland Security, Immigration and Customs Enforcement ("ICE"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Because this Affidavit is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported herein, they are reported in substance and in part, except where otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. At all times relevant to this Complaint, defendant GADIEL MOLINA-ANDRADE ("MOLINA-ANDRADE"), was an alien and a citizen and national of Honduras, and not a citizen of the United States.
2. On or about May 13, 2012, MOLINA-ANDRADE illegally entered the United States at or near Brownsville, Texas.
3. On or about May 17, 2012, MOLINA-ANDRADE was arrested in Texas by the United States Border Patrol.
4. On or about May 18, 2012, MOLINA-ANDRADE was determined to be an inadmissible alien, and the United States Border Patrol issued a Notice and Order of Expedited Removal ("Order of Removal").
5. On or about May 28, 2012, MOLINA-ANDRADE was removed from the United States to Honduras pursuant to the Order of Removal.
6. After MOLINA-ANDRADE was removed from the United States on or about May 28, 2012, he returned to the United States without permission on an unknown date at an unknown location.
7. On or about August 26, 2013, MOLINA-ANDRADE was arrested in Boonton, New Jersey and charged with possession of a controlled substance (marijuana), in violation of N.J.S.A. § 2C:35-10(a)(4). On or about September 13, 2013, MOLINA-ANDRADE was granted a conditional discharge for this offense.
8. On or about November 27, 2013, MOLINA-ANDRADE's Order of Removal was reinstated.
9. On or about December 20, 2013, MOLINA-ANDRADE was removed from the United States to Honduras pursuant to the Order of Removal.

10. After MOLINA-ANDRADE was removed from the United States on or about December 20, 2013, he returned to the United States without permission on an unknown date at an unknown location.

11. On or about September 16, 2023, MOLINA-ANDRADE was arrested in Lakewood Township, New Jersey and charged with possession of a controlled substance (cocaine), in violation of N.J.S.A. § 2C:35-10(a)(1). This charge is pending disposition.

12. On or about May 4, 2025, MOLINA-ANDRADE was arrested in Lakewood Township, New Jersey and charged with simple assault, in violation of N.J.S.A. § 2C:12-1(a)(1), and hindering apprehension or prosecution, in violation of N.J.S.A. § 2C:29-3(a)(7). The charges are pending disposition.

13. On or about May 5, 2025, federal law enforcement officers became aware MOLINA-ANDRADE was in New Jersey.

14. Officers of the Department of Homeland Security, Homeland Security Investigations Forensic Laboratory conducted an analysis of fingerprints taken from MOLINA-ANDRADE when he was removed from the United States on or about December 20, 2013 and from his arrests on or about May 17, 2012, and May 4, 2025, and have confirmed that MOLINA-ANDRADE is the was the same individual who produced the sets of fingerprints.

15. Neither the Secretary of Homeland Security nor the Attorney General of the United States expressly consented to MOLINA-ANDRADE reapplying for admission to the United States prior to his reembarkation at a place outside the United States or his entry into the United States.